UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

OCT 07 2016

CERTIFIED MAIL 7009 1680 0000 7662 6514
RETURN RECEIPT REQUESTED

Mr. Robert R. Meacham
EHS Manager
CWC Textron, Incorporated
1085 West Sherman Boulevard
Muskegon, Michigan 49441

Re: Notice of Violation
Compliance Evaluation Inspection (RCRA portion of Multi-Media Inspection)
MID006030357

Dear Mr. Meacham:

On February 23-24, 2016, a representative of the U.S. Environmental Protection Agency inspected the CWC Textron, Incorporated (CWC Textron) facility located in Muskegon, Michigan. As a small quantity generator of hazardous waste, CWC Textron is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate CWC Textron's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by CWC Textron, EPA's review of records pertaining to CWC Textron, and the inspector's observations, EPA has determined that CWC Textron has unlawfully stored hazardous waste without a license or interim status as a result of CWC Textron's failure to comply with certain conditions for a license exemption under Michigan Administrative Code (hereafter "MICH. ADMIN. CODE"), MICH. ADMIN. CODE r. 299.9306(2) and (4)-(6) [40 C.F.R. § 262.34(c) and (d)-(f)], and MICH. ADMIN. CODE. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which CWC Textron was out of compliance at the time of the inspection in paragraphs # 1-5, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from

MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 3-5 are also independent TSD requirements incorporated from MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, each failure of CWC Textron to comply with these conditions is also a violation of the corresponding requirement in MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) [40 C.F.R. Part 265], or MICH. ADMIN. CODE r. 299.9601(1) and (2) and 299.11003(1)(m)-(o) [40 C.F.R. Part 264].

Finally, EPA has determined that CWC Textron violated RCRA requirements related to hazardous waste determination and documentation, biennial reporting, and used oil as described in paragraphs # 6-8, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, CWC Textron was out of compliance with the following small quantity generator license exemption conditions:

1. Satellite Container Management

Under MICH. ADMIN. CODE r. 299.9306(2) [40 C.F.R. § 262.34(c)(1)(ii)], a small quantity generator must mark each satellite accumulation container holding hazardous waste with the words "Hazardous Waste." In the State of Michigan, it is further required under MICH. ADMIN. CODE r. 299.9306(2) that satellite accumulation containers used to store hazardous waste must also be labeled or marked with the hazardous waste number (code) of the waste, or the chemical name for the hazardous waste number of the waste.

During the inspection of the Stock Room, there was one satellite accumulation area (SAA) that consisted of one 55-gallon drum. The drum contained spent aerosol cans. The drum was labeled as "Used Aerosol Cans" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum.

2. Posting Emergency Information

Under MICH. ADMIN. CODE r. 299.9306(4)(g) [40 C.F.R. § 262.34(d)(5)(ii)(A)-(C)], a small quantity generator must post, next to the telephone, the name and telephone number of the emergency coordinator; the location of the fire extinguishers and spill control material and, if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm.

During the site tour, there was no observed posting of the facility's emergency information and equipment next to a phone. During the inspection of the Paint Shed

(hazardous waste storage area), there was emergency and equipment information posted in this area, but it was not posted next to a phone.

The license exemption conditions identified below in paragraphs # 3-5 are also independent TSD requirements violated (during period of Large Quantity Generator Status) by CWC Textron:

3. Hazardous Waste Training (Required During Past Period (2013-2015) of Large Quantity Generator Status)

Under MICH. ADMIN. CODE r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)], a large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* MICH. ADMIN. CODE. r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;

2) A written job description for each position at the facility related to hazardous waste management;

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* MICH. ADMIN. CODE. r. 299.9306(1)(d), 40 C.F.R. § 265.16(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

During the inspection of records, EPA determined that CWC Textron became a large quantity generator during 2013, 2014, and 2015, based upon hazardous waste generation amounts. There was no documented RCRA annual training in 2013 for the following employees that held a position involving hazardous waste management: Mr. Meacham,

Craig Schaub, Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka. There was no documented RCRA annual training in 2014 for the following employees that held a position involving hazardous waste management: Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka. There was no documented RCRA annual training in 2015 for the following employees that held a position involving hazardous waste management: Craig Schaub, Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka. There were no documented job titles, RCRA job descriptions related to hazardous waste management, and the type and amount of continuing training for the following employees: Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka.

4. Contingency Plan Content (Required During Past Period (2013-2015) of Large Quantity Generator Status)

The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 40 C.F.R. § 265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. *See* MICH. ADMIN. CODE r. 299.9306(1)(d), 40 C.F.R. § 265.52(d) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)].

The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities. *See* MICH. ADMIN. CODE r. 299.9306(1)(d), 40 C.F.R. § 265.52(e) [40 C.F.R. §§ 262.34(a)(4) and 265.52(e)].

CWC Textron's Emergency Action Plan (and other documented procedure manuals) indicated that there was no home address and home/cell phone number listed for the site's emergency coordinator (Mr. Meacham). Also, there was no documentation of an equipment list that included the location and the description of capabilities for the facility's spill control equipment, and locations for the facility's decontamination equipment.

5. Contingency Plan Copies (Required During Past Period (2013-2015) of Large Quantity Generator Status)

A large quantity generator must ensure that a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. *See* MICH. ADMIN. CODE r. 299.9306(1)(d), 40 C.F.R. § 265.53(b) [40 C.F.R. §§ 262.34(a)(4) and 265.53(b)].

During the review of CWC Textron's Emergency Action Plan (and other documented procedure manuals) there was no documentation that indicated that the required contingency plan information had been submitted to the required emergency authorities.

Summary: By failing to comply with the conditions for a license exemption, above, CWC Textron became an operator of a hazardous waste storage facility and was required to obtain a Michigan hazardous waste storage license. CWC Textron failed to apply for such a license. CWC Textron's failure to apply for and obtain a hazardous waste storage license violated the requirements of MICH. ADMIN. CODE r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) is also an independent violation of the corresponding TSD requirement.

CWC Textron violated the following generator requirements:

6. Hazardous Waste Determinations and Recordkeeping

Under MICH. ADMIN. CODE r. 299.9302(1) [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

Under MICH. ADMIN. CODE r. 299.9307(1) [40 C.F.R. § 262.40(c)], the generator must keep records of any test results, waste analyses, or other determinations made pursuant to MICH. ADMIN. CODE r. 299.9302 for not less than three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.

During the review of records, there were no documented waste determinations for the mold grinder waste dust and the Brinell sander waste dust as stated by Mr. Meacham. There was not a conclusive (TCLP for chromium) waste determination documented for the waste slag. There was not a conclusive (TCLP for chromium) waste determination documented for the dust collector #1 waste stream. There was not a conclusive (TCLP for chromium and lead) waste determination documented for the dust collector #5 waste stream. There was no waste determination documented for the cupola scrubber waste water (prior to magnesium hydroxide) at the point of generation. There was not a conclusive waste determination made for the waste in the drum (located in the Oil/Water Separator Room) was labeled as "Universal Waste" and "Oil, Grease, Salt Sludge, Hemi Rinse Sludge."

7. Biennial Reporting Requirements

Under MICH. ADMIN. CODE r. 299.9307(4) [40 C.F.R. § 262.40(b)], a generator shall keep a copy of the data submitted under R 299.9308(1), exception report, or other report required by the director, or his or her designee, for a period of not less than 3 years from the due date of the report.

Also, under MICH. ADMIN. CODE r. 299.9308(1) [40 C.F.R. § 262.41(a)], a generator of more than 1,000 kilograms of hazardous waste shall provide to the MDEQ director or the director's designee the data necessary for the department to prepare and submit Michigan's hazardous waste report as required to the EPA. The data shall be submitted in a format specified by the director or the director's designee. The data shall be acquired from the information required in Mich. Admin. Code r. 299.9308(2) and Parts 3 (Mich. Admin. Code r. 299.9301 *et seq.*) and 6 (Mich. Admin. Code r. 299.9601 *et seq.*) of the Michigan Hazardous Waste Management rules, other reporting mechanisms used by the director to obtain the information specified in 40 C.F.R. §262.41 (a)(1) to (8), and by the EPA as part of a federal information collection request published in conjunction with 40 C.F.R. §262.41(a).

CWC Textron did not submit its hazardous waste biennial report (large quantity generator in 2013) for the year 2013 (due March 1, 2014) as stated by Mr. Meacham.

8. Used Oil Requirement

Under Mich. Admin. Code. r. 299.9810(3) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

During the inspection of the Tank 4 Oil Quench area, there was a pan on the floor that contained used cooling oil as stated by Mr. Meacham. The pan was not labeled as "Used Oil."

During the inspection of the Oil/Water Separator Room, there were three 250-gallon totes that contained used oil. All three of the totes were not labeled as "Used Oil."

At this time, EPA is not requiring CWC Textron to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs # 1-5, above.

After the inspection, as documented in an April 28, 2016, letter to EPA, you took certain actions to establish compliance with the above conditions and hazardous waste determinations and recordkeeping, and used oil requirements. Your letter did not include any actions you may have taken related to the biennial reporting requirements in paragraph # 7. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraph # 7.

You should submit your response to Bryan Gangwisch, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at gangwisch.bryan@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Wade O'Boyle, MDEQ – Southeast Michigan District Office
oboylew@michigan.gov

John Craig, MDEQ – Lansing HQ Office
craigj@michigan.gov

Lonnie Lee, MDEQ – Lansing HQ Office
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: CWC Textron, Incorporated

EPA ID No.: MID006030357

ADDRESS: 1085 West Sherman Boulevard
Muskegon, MI 49441

DATES OF INSPECTION: February 23-24, 2016

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: _____ 3/11/16
Bryan Gangwisch — Date Completed
Environmental Scientist
Compliance Section #2

APPROVED BY: _____ 3/22/16
Julie Morris, Chief — Date
Compliance Section #2

Purpose of Inspection

This inspection was an evaluation of CWC Textron Incorporated (CWC Textron), and its compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and the Code of Federal Regulations (CFR). I performed the inspection with Wade O'Boyle from the Michigan Department of Environmental Quality (MDEQ). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI) that was part of a U.S. EPA Multi-Media Inspection (MMI).

Participants

Robert Meacham, EHS Manager	CWC Textron
Erik Jepsen, Director of Operations	CWC Textron
Bryan Gangwisch, Environmental Scientist	U.S. EPA
Paul Novak, Geologist	U.S. EPA
Katharina Bellairs, Environmental Engineer	U.S. EPA
Zachary Sasnow, Environmental Engineer	U.S. EPA
Wade O'Boyle, Environmental Quality Analyst	MDEQ
Eric Grinstern, Environmental Specialist	MDEQ

Introduction

We arrived at the site on February 23, 2016, at approximately 8:00 a.m. The weather consisted of cloudy conditions with light wind, and an ambient air temperature of approximately 33 degrees Fahrenheit. We entered the facility and waited in the reception area. As Mr. Meacham arrived, we introduced ourselves, presented our inspector credentials, and described the purpose of the inspection and the process by which we intended to conduct the inspection. We were led to a conference room for a safety meeting and opening conference. Mr. Meacham provided us with a verbal description of the site, led the tour throughout the facility, and then attempted to provide us with the records we requested for review.

Site Description

During the opening conference Mr. Meacham or Mr. Jepsen stated all of the following unless otherwise noted: CWC Textron began operations at this location in 1956. The facility conducts steel casting operations and produces camshafts (automotive), balance shafts and bearing caps (engine). There are approximately 301 total employees at this facility that work four days per week (melting) and six days per week (finishing and grinding). The entire facility that is comprised of 287,000 square feet, is situated on 56 acres. As other facility buildings had been

demolished through the years, the remaining operations were conducted in Plant 5. At the time of the inspection, CWC Textron's operations were utilizing 97% ductile iron and 3% grey iron.

The facility operations were comprised of the following: iron melting, casting (350 tons per day), finishing, grinding, flame/lobe hardening, drilling, and laboratory testing. There were no steel pickling operations being conducted. There were no paint booth operations being conducted (there was aerosol paint usage). The facility's waste water is discharged to the city sewer and is regulated via pre-treatment permit through the Muskegon County Waste Water Management System. At the West end of the property there were two lined emission system ponds for re-circulating (through a cistern in each pond) cupola scrubber system water. One pond system is in operation (sampled every two months) while the other pond is being cleaned (settled sludge excavated out every two years). The scrubber water from the cupola melting operation is neutralized with magnesium hydroxide before being discharged into either the North or South scrubber pond. There used to be a wet dust control system that discharged into these two ponds. The wet dust control system was discontinued in 2011. There were also three stormwater ponds adjacent (further to the west) to the two scrubber ponds. The westernmost of the three ponds receives non-contact cooling water and stormwater, which then overflows into the two smaller sand filtration ponds. After the sand filtration, the water passes through a regulated NPDES sampling point before discharged off-site. The three stormwater/non-contact ponds and the sediment in the ponds have not been sampled by CWC Textron. Also, groundwater monitoring has been occurring and the reports have been being sent to MDEQ. CWC Textron currently samples for iron, manganese, fluoride, and sodium at certain wells. The facility uses groundwater for operational use. City water is used for domestic and potable supply.

CWC Textron was operating as a small quantity generator at the time of the inspection according to facility personnel and the facility's determination of their waste generation rate.

The main waste streams that are regularly generated at CWC Textron consist of: waste sand (green), cupola scrubber water, salt bottoms, transformer fluid flush, dust, baghouse dust, calcium oxide lime, iron slag, rags, aerosol cans, and spent parts washer solvent. The hazardous waste codes associated with the main hazardous waste types that are generated at CWC Textron consist of: D001, D002, D039, and F002. There is used oil generation at the facility, and is picked up for recycling (Merle Boes – Holland, Michigan). The facility's spent universal waste fluorescent bulbs and batteries are picked up for recycling (Veolia). The facility's scrap metal is picked up for recycling (Padnos – Holland, Michigan). There was no electronic waste observed during the inspection.

General Site Tour

A general physical walk-through of the facility was conducted at approximately 10:45 a.m. We started at the Melting area. We observed the cupola and holding furnaces. We observed the area where the salt bottoms are generated, there was no waste in this area at the time of the inspection.

We observed the grinding/flask area.

We observed one of the torit dust collector systems.

At the Tank 4 Oil Quench area, there was a pan on the floor that contained used cooling oil as stated by Mr. Meacham. The pan was not labeled as "Used Oil."

Next, we inspected the Quench Room. There were two product oil tanks that are used to hold the in-process oil from the quench tanks when they are being cleaned out as stated by Mr. Meacham. After the quench tanks are cleaned, the in-process oil is then pumped back to the quench tanks for reuse as stated by Mr. Meacham.

At the Oil/Water Separator Room, there was one 900-gallon used oil tank that was labeled as "Used Oil." There were three 250-gallon totes that contained used oil. All three of the totes were not labeled as "Used Oil." Pictures were taken. There was one 55-gallon drum, which was situated on a pallet. The drum was labeled as "Universal Waste" and "Oil, Grease, Salt Sludge, Hemi Rinse Sludge", and was closed. There were two empty totes in the area.

Next, I inspected the Chip Room. There were two product oil tanks, situated on spill containment pallets, as stated by Mr. Meacham. There were chips/turnings observed that are managed as scrap steel. We observed the # 5 dust collector and the associated sacks.

At the Yard, we observed the Slag Pile. The iron slag gets crushed and is used as road aggregate as stated by Mr. Meacham. We also observed the coke, pig iron, scrap steel, and limestone raw material stock. We observed one 20 cubic-yard roll-off container that contained bags of waste dust. The waste dust goes to Ottawa County Farms Landfill (Coopersville, Michigan) as stated by Mr. Meacham. We observed two 20 cubic-yard roll-off containers that contained spent calcium oxide lime. The spent lime also goes to Ottawa County Farms Landfill (Coopersville, Michigan) as stated by Mr. Meacham. The baghouse dust collectors at the facility are numbered in the following: #1, #2, #5, #6, #12, #13, #17, and #19 as stated by Mr. Meacham.

Next, we inspected the Magnesium Hydroxide Room. We observed one 8,000-gallon tank that was utilized to treat (pH adjustment) the cupola scrubber water before being discharged into one of the two scrubber water ponds as stated by Mr. Meacham.

Outside, we observed the North Pond (scrubber water pond). CWC Textron was utilizing (discharging into) this pond at the time of the inspection. There were two pipes going into the pond. One of the pipes is for current use of discharging scrubber water, the other pipe was for the previous wet dust/sludge discharge system that was discontinued in 2011 as stated by Mr. Meacham. Pictures were taken.

Still outside, we observed the South Pond (scrubber water pond). The South Pond was cleaned (sludge excavated out) in the fall of 2015 as stated by Mr. Meacham. Pictures were taken.

Still outside, we observed the stormwater pond system that is discharged through NPDES.

Still outside, we observed monitoring well #10. A picture was taken. We also observed baghouse #1 and #2 dust collectors for the waste sand. A picture was taken (#1 on the right). There was a roll-off that contained 15 cubic-yard bags (about 2 roll-offs per day go out) that go to Ottawa County Farms Landfill since 2011 when this system came on line as stated by Mr. Meacham.

The inspectors broke for lunch and left the facility at approximately 12:30 p.m.

The inspectors arrived back at the facility at approximately 1:45 p.m.

The general site tour continued at approximately 2:15 p.m.

Back inside the facility, we observed the Final Blast area. All of the spent material from this area ends up at dust collector #13 as stated by Mr. Meacham.

Next, we inspected the Shakeout area. We observed a hopper that contained waste sand. A picture was taken.

At the Broken Mold Grinder area, there was one 55-gallon drum that was connected to this grinder system.

Next, we inspected the Brinell Sander area. There was one 55-gallon drum that was connected to this sander system.

We observed the bearing caps area.

Next, we inspected the Metallurgical Laboratory. There was one 1-gallon container that contained waste ceramic crucibles. An etching operation occurs in the lab as part of a testing procedure and a 2% etching solution is utilized and then neutralized before being discharged down the drain as stated by a lab employee and Mr. Meacham.

At the Butler Building, there were several containers of product and raw materials (alloying agents, lime, steel shot, manganese, hydraulic cylinders and conveyor belts) as stated by Mr. Meacham.

Next, we inspected the Paint Shed (hazardous waste storage area). There was no waste in storage at the time of the inspection. There were several containers of product acids and product mineral oils as stated by Mr. Meacham. There was a spill containment pallet situated over a spill containment bin that provided secondary containment. Pictures were taken. There was concrete berm that surrounded a portion of the storage area. The hazardous waste containers are always stored on the spill containment pallets and bin as stated by Mr. Meacham. The weekly hazardous waste inspection/spill log (documented weekly inspections for November 2015 - February 2016) was observed in this area. There was emergency and equipment information posted in this area, but it was not posted next to a phone. A picture was taken. Mr. Meacham stated he conducts the weekly inspections. There was a fire extinguisher, decontamination equipment, spill control

equipment, and two-way radio usage by employees in the vicinity. Aisle space was sufficient in this area. There were empty drums in this area.

On the way to inspect the Garage, we observed the lift station industrial discharge sample point (regulated industrial discharge permit) for Muskegon County (sampled twice per year by county and sampled twice per year by CWC Textron) as stated by Mr. Meacham.

At the Garage, there were several 55-gallon drums that contained product oils and product coolants as stated by Mr. Meacham. There were several totes that contained product reclaimed quench oil as stated by Mr. Meacham. There was no waste in this area at the time of the inspection. There was a spill containment kit and absorbent pads in the area. There was one parts washer.

Next, we inspected the Stock Room. There was one satellite accumulation area (SAA) that consisted of one 55-gallon drum. The drum contained spent aerosol cans. The drum was labeled as "Used Aerosol Cans" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum. A picture was taken. There was one box that contained spent four foot bulbs. The box was labeled as "Universal Waste Lamps", was dated 2/18/16, and was closed. There was one 3-gallon container that contained spent universal waste batteries. The container was labeled as "Universal Waste Batteries", was dated 12/8/15, and was closed. There was one flammable cabinet that was storing containers of product greases and product oils as stated by Mr. Meacham.

Also, during the site tour, I did not observe any posting of the facility's emergency and equipment information next to a phone.

The inspectors left the site on February 23, 2016, at approximately 5:00 p.m.

The inspectors arrived back at the site on February 24, 2016, at approximately 8:00 a.m. The weather consisted of cloudy conditions with light wind, and an ambient air temperature of approximately 35 degrees Fahrenheit.

Record Review

The review of records was conducted. The recent manifests show that all hazardous waste was sent to the following TSDFs: Clean Harbors Deer Park, LLC (TXD055141378), Clean Harbors El Dorado, LLC (ARD069748192), Clean Harbors Environmental Service, Inc. (OHD000724153), Spring Grove Resource Recovery, Inc. (OHD000816629), and Safety-Kleen (KYD053348108). The following transporters were also used: Heritage – Crystal Clean, LLC (ILR000130062), Robbie Wood, Inc. (ALD067138891), Clean Harbors Environmental Service, Inc. (MAD039322250), Hazmat Environmental Group (NYD980769947), Triad Transport (OKD981588791), and Safety-Kleen Systems, Inc. (TXR000081205). At least three years of manifests were retained on-site. There were LDR notices available for review for each hazardous waste stream. There were no hazardous waste shipments that occurred in 2016 at the time of the inspection. There were two hazardous waste shipments that had occurred in 2015 that put CWC

Textron at large quantity generator status for the year. The hazardous waste shipments in 2015 included: approximately 1,238 kilograms (D039, F002 – transformer fluid flush) (one time generation as stated by Mr. Meacham) shipped on June 4, 2015; approximately 2,384 kilograms (D039, F002 – transformer fluid flush) (one time generation as stated by Mr. Meacham) shipped on November 5, 2015. There was one hazardous waste shipment that had occurred in 2014 that put CWC Textron at large quantity generator status for the year. The hazardous waste shipment in 2014 included: approximately 440 gallons (8 drums) (D001, D002 – salt bottoms) (one time generation as stated by Mr. Meacham) shipped on October 2, 2014. There were five hazardous waste shipments that had occurred in 2013 (one of the five shipments put CWC Textron at large quantity generator status for the year). The hazardous waste shipments in 2013 included: approximately 475 gallons (9 drums) (D001, D002 – salt bottoms) (one time generation as stated by Mr. Meacham) shipped on March 7, 2013; approximately 200 gallons (D002) shipped on March 7, 2013; approximately 55 gallons (D001 – waste paint) and approximately 55 gallons (D002 – hydrochloric acid) shipped on March 7, 2013; approximately 55 gallons (D001 – waste paint) shipped on August 1, 2013; and approximately 165 gallons (D001, D002 – salt bottoms) shipped on August 1, 2013.

I observed the facility's industrial waste water discharge permit # TCWC – s04a through the Muskegon County Wastewater Management System. The industrial discharge permit was effective June 1, 2013, and has an expiration date of March 31, 2016.

I observed the facility's National Pollutant Discharge Elimination System (NPDES) Wastewater Discharge General Permit (Stormwater and Non-contact cooling water) # MIG250000 through the State of Michigan (MDEQ). The NPDES (Stormwater and Non-contact cooling water) permit was effective April 1, 2013, and has an expiration date of April 1, 2018.

I observed the facility's air Renewable Operating Permit # MI-ROP-B1909-2013 and Source-Wide Permit to Install # MI-PTI-B1909-2013 through the State of Michigan (MDEQ). The air permit was effective June 24, 2013, and has an expiration date of June 24, 2018.

CWC Textron did not submit its hazardous waste biennial report (large quantity generator in 2013) for the year 2013 (due March 1, 2014) as stated by Mr. Meacham.

The facility conducts weekly inspections of the Paint Shed (hazardous waste storage area). Mr. Meacham conducts the weekly inspections. The weekly inspections were being documented and were reviewed (at least three years of logs). The emergency equipment was being tested and maintained to assure operation. The emergency equipment inspections were also documented.

Waste determinations were documented through analysis/waste profile, and/or MSDS. The analytical testing data/profile for the North Pond (scrubber pond) and the West Craneway (waste sand and cuttings area) was reviewed. Kar Laboratories, Inc., performed (on 1/30/15) a TCLP analysis (cadmium, chromium, lead, and zinc) and pH testing on the cupola scrubber waste stream discharge. Subsequent analytical testing data/profile for the North Pond (scrubber pond) and the West Craneway (waste sand and cuttings area) was reviewed. Kar Laboratories, Inc.,

performed (on 4/3/15, 6/16/15, 8/11/15, 10/15/15, and 12/7/15) a TCLP analysis (cadmium, chromium, lead, and zinc). Additional analytical testing data/profile for the North Pond (scrubber pond) was reviewed. Kar Laboratories, Inc., performed (on 2/13/14, 6/11/14, 10/3/14, 12/5/14, 1/22/13, 3/19/13, 5/23/13, 8/15/13, and 9/24/13) a TCLP analysis (cadmium, chromium, lead, and zinc) on the cupola scrubber waste stream. The analytical testing data/profile for the sand clean-up waste stream was reviewed. Trimatrix Laboratories, Inc., performed (on 9/22/10) a TCLP analysis on the sand clean-up waste stream. The analytical testing data/profile for the baghouse (Dust Cell #13 and Dust Cell #1) dust waste stream were reviewed. Trace Analytical Laboratories, Inc., performed a Totals analysis (iron) on the baghouse (Dust Cell #13 and Dust Cell #1) dust waste stream. The analytical testing data/profile for the slag waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 10/29/08) a Totals analysis (results indicated 160 mg/kg for chromium) on the slag waste stream. The analytical testing data/profile for the compressor oil waste stream was reviewed. Trace Analytical Laboratories, Inc., performed an analysis (pesticides and PCBs) on the compressor oil waste stream. The analytical testing data/profile for the oil/water separator sludge waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 4/8/09) a TCLP analysis on the oil/water separator sludge waste stream. The analytical testing data/profile for the dust collector #13 waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 6/23/06) a TCLP analysis on the dust collector #13 waste stream. The analytical testing data/profile for the West Craneway area was reviewed. Trace Analytical Laboratories, Inc., performed (on 6/23/06) a Totals and TCLP analysis on the West Craneway area.

The analytical testing data/profile for the dust collector #1 waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 6/23/06) a Totals analysis (results indicated 290 mg/kg for chromium) on the dust collector #1 waste stream. The analytical testing data/profile for the dust collector #17 waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 7/17/06) a Totals analysis on the dust collector #17 waste stream. The analytical testing data/profile for the dust collector #5 waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 7/17/06) a Totals analysis (results indicated 470 mg/kg for chromium and 480 mg/kg for lead) on the dust collector #5 waste stream. The analytical testing data/profile for the dust collector #12 waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 7/17/06) a Totals analysis on the dust collector #12 waste stream. The analytical testing data/profile for the dust collector #6 waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 7/17/06) a Totals analysis on the dust collector #6 waste stream. The analytical testing data/profile for the North Pond water waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 7/17/06) a TCLP analysis on the North Pond water waste stream. The analytical testing data/profile for the spent lime waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 8/21/06) a Totals analysis on the spent lime waste stream. The analytical testing data/profile for the furnace collector waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 8/21/06) a TCLP analysis on the furnace collector waste stream. The analytical testing data/profile for the wet dust collector waste stream was reviewed. Kar Laboratories, Inc., performed (on 1/6/06 and 3/7/06) a TCLP analysis (cadmium, chromium, lead, and zinc) on the wet dust collector waste stream. The analytical testing data/profile for the West Craneway area

was reviewed. Kar Laboratories, Inc., performed (on 1/6/06 and 3/7/06) a TCLP analysis (cadmium, chromium, lead, and zinc) on the West Craneway area. The analytical testing data/profile for the East Craneway area was reviewed. Kar Laboratories, Inc., performed (on 1/6/06 and 3/7/06) a TCLP analysis on the East Craneway area. The analytical testing data/profile for the cupola scrubber waste stream was reviewed. Kar Laboratories, Inc., performed (on 1/6/06 and 3/7/06) a TCLP analysis on the cupola scrubber waste stream. The analytical testing data/profile for the sand system dust collector waste stream was reviewed. Trimatrix Laboratories, Inc., performed (on 8/4/15) a TCLP analysis on the sand system dust collector waste stream. The analytical testing data/profile for the furnace dust collector waste stream was reviewed. Trimatrix Laboratories, Inc., performed (on 8/4/15) a TCLP analysis on the furnace dust collector waste stream. The analytical testing data/profile for the spent lime waste stream was reviewed. Trimatrix Laboratories, Inc., performed (on 8/4/15) a TCLP analysis on the spent lime waste stream. The analytical testing data/profile for the West end sand pile waste stream was reviewed. Trimatrix Laboratories, Inc., performed (on 8/4/15) a TCLP analysis on the West end sand pile waste stream. The analytical testing data/profile for the West Craneway area was reviewed. Kar Laboratories, Inc., performed (on 2/5/16) a TCLP analysis (cadmium, chromium, lead, and zinc) on the West Craneway area. The analytical testing data/profile for the cupola (North Pond) scrubber waste stream was reviewed. Kar Laboratories, Inc., performed (on 2/5/16) a TCLP analysis on the cupola (North Pond) scrubber waste stream. A waste profile for the West end sand pile waste stream (7/12/06 from Ottawa County Farms Landfill, Coopersville, Michigan) was reviewed. A waste profile (special waste re-certification) for the spent lime (8/21/15 from Ottawa County Farms Landfill, Coopersville, Michigan) was reviewed. A waste profile (special waste re-certification) for the West end sand pile waste stream (8/21/15 from Ottawa County Farms Landfill, Coopersville, Michigan) was reviewed. A waste profile (special waste re-certification) for the furnace dust collector waste stream (8/21/15 from Ottawa County Farms Landfill, Coopersville, Michigan) was reviewed. A waste profile (special waste re-certification) for the sand system dust collector waste stream (8/21/15 from Ottawa County Farms Landfill, Coopersville, Michigan) was reviewed. A waste profile for the 2% nital waste stream (laboratory etching solution is above 2 pH when disposed to drain – four gallons per year is discharged to the sanitary wastewater sewer as stated by Mr. Meacham) was reviewed. An MSDS for the mold release chemical was reviewed. An MSDS for the parts washer solution (Arma Kleen) was reviewed.

There were no documented waste determinations for the mold grinder waste dust and the Brinell sander waste dust as stated by Mr. Meacham. There was not a conclusive (TCLP for chromium) waste determination documented for the waste slag. There was not a conclusive (TCLP for chromium) waste determination documented for the dust collector #1 waste stream. There was not a conclusive (TCLP for chromium and lead) waste determination documented for the dust collector #5 waste stream. There was no waste determination documented for the cupola scrubber waste water (prior to magnesium hydroxide) at the point of generation. There was not a conclusive waste determination made for the waste in the drum (located in the Oil/Water Separator Room) was labeled as "Universal Waste" and "Oil, Grease, Salt Sludge, Hemi Rinse Sludge."

RCRA training documentation was reviewed for the years (2013, 2014, and 2015) CWC Textron had become a large quantity generator. There was no documented RCRA annual training in 2013 for the following employees that held a position involving hazardous waste management: Mr. Meacham, Craig Schaub, Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka. There was no documented RCRA annual training in 2014 for the following employees that held a position involving hazardous waste management: Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka. There was no documented RCRA annual training in 2015 for the following employees that held a position involving hazardous waste management: Craig Schaub, Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka. There were no documented job titles, RCRA job descriptions related to hazardous waste management, and the type and amount of continuing training for the following employees: Don Camp, Dan Banarding, Todd Hathaway, and Ron Micka.

Contingency plan documentation was reviewed for the period CWC Textron had become a large quantity generator. Some of the contingency plan requirements were documented through the facility's Emergency Action Plan and other documented procedure manuals. However, there was no home address and home/cell phone number listed for the site's emergency coordinator (Mr. Meacham). There was no documentation that indicated that the required contingency plan information had been submitted to the required emergency authorities. There was no documentation of an equipment list that included the location and the description of capabilities for the facility's spill control equipment, and locations for the facility's decontamination equipment.

There were no reported spills or fires related to hazardous waste as stated by Mr. Meacham. The entire facility is equipped with an emergency alarm that gets sent to the guard/security office to notify authorities as stated by Mr. Meacham. Some parts of the facility is equipped with a sprinkler system as stated by Mr. Meacham. There is two-way radio usage at the facility as stated by Mr. Meacham. The facility's fire extinguishers are inspected monthly by Muskegon Fire Equipment. The facility's emergency coordinator is Mr. Meacham. The fire department conducts a tour of the facility every two years as stated by Mr. Meacham.

Closing Conference

I summarized the RCRA requirements for the following: SAA hazardous waste container management, documentation of waste determinations, biennial reporting (large quantity generator years) used oil labeling, RCRA training (large quantity generator years 2013, 2014, and 2015), contingency plan (large quantity generator), and posting of emergency and equipment information next to a phone. The inspection concluded on February 24, 2016, at approximately 4:05 p.m.

CWC Textron made no claim of confidential business information related to any information obtained, or any pictures taken by U.S. EPA during the inspection.

Documents received during this inspection are as follows:

- copy of facility process flow diagram model (1 pg.)
- copy of facility process flow diagram (2 pgs.)
- copy of facility's site layout titled "Plant 5 Non-Contact Cooling and Storm Water System" (1 pg.)
- copy of facility's "Environmental Policy 2016" (1 pg.)

Documents given to CWC Textron during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- Michigan RETAP handout

A photo log is attached consisting of fifteen (15) photos taken by U.S. EPA during the inspection.

1. A view, of the North Pond (scrubber water pond). CWC Textron was utilizing (discharging into) this pond at the time of the inspection. There were two pipes going into the pond. One of the pipes is for current use of discharging scrubber water, the other pipe was for the previous wet dust/sludge discharge system that was discontinued in 2011 as stated by Mr. Meacham.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

2. Another view, of the North Pond (scrubber water pond). CWC Textron was utilizing (discharging into) this pond at the time of the inspection.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

3. A view, of the South Pond (scrubber water pond). The South Pond was cleaned (sludge excavated out) in the fall of 2015 as stated by Mr. Meacham.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

4. Another view, of the South Pond (scrubber water pond - cistern for recirculating the scrubber water back into the process). The South Pond was cleaned (sludge excavated out) in the fall of 2015.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

5. Another view, of the North Pond (scrubber water pond - cistern for recirculating the scrubber water back into the process). CWC Textron was utilizing (discharging into) this pond at the time of the inspection.

CWC Textron, Incorporated - Muskegon, MI
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6. A view of monitoring well #10.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

7. A view of the baghouse #1 and #2 dust collectors for the waste sand (#1 on the right). There was a roll-off that contained 15 cubic-yard bags (about 2 roll-offs per day go out) that go to Ottawa County Farms Landfill since 2011 when this system came on line as stated by Mr. Meacham.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

8. A view, at the Shakeout area, of a hopper that contained waste sand.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

9. A view, at the Paint Shed (hazardous waste storage area), of a spill containment pallet situated over a spill containment bin that provided secondary containment. There was no waste in storage at the time of the inspection. The hazardous waste containers are always stored on the spill containment pallets and bin as stated by Mr. Meacham. There were several containers of product acids and product mineral oils as stated by Mr. Meacham.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

10. Another view, at the Paint Shed Shed (hazardous waste storage area), of a spill containment pallet situated over a spill containment bin that provided secondary containment, and the concrete berm that surrounded a portion of the storage area. There was no waste in storage at the time of the inspection.

CWC Textron, Incorporated - Muskegon, MI
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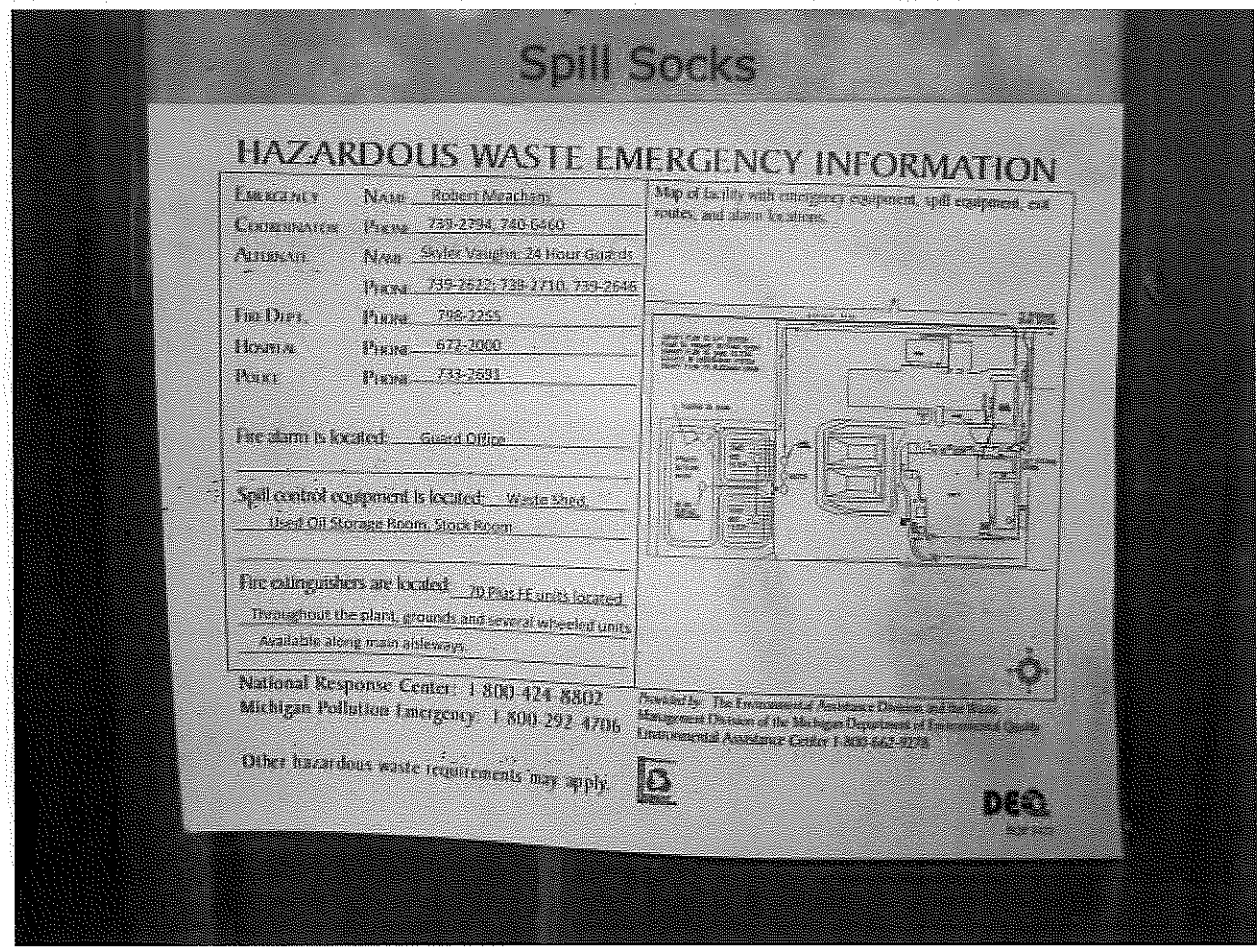
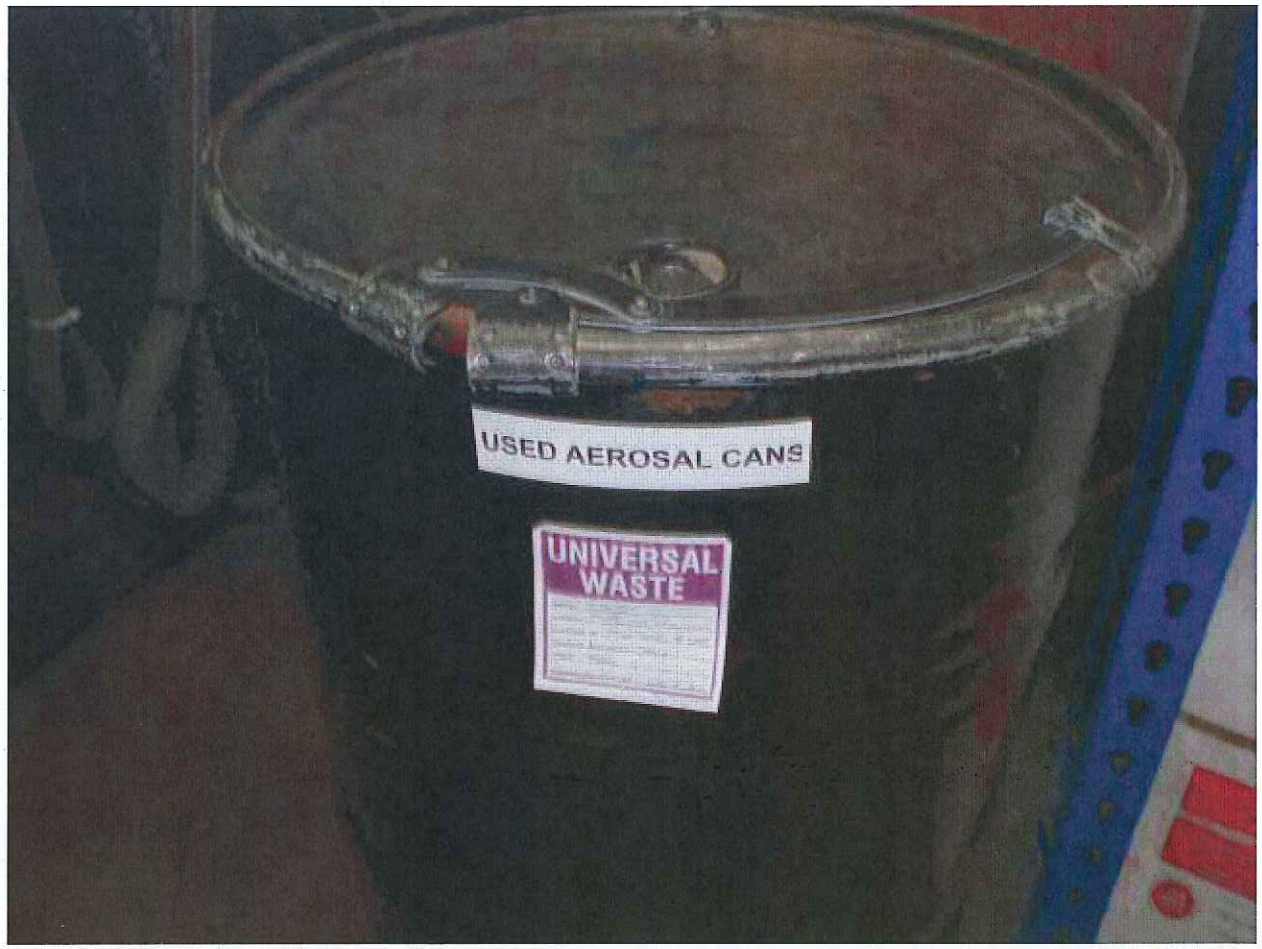


11. A view, at the Paint Shed (hazardous waste storage area), of the weekly hazardous waste inspection/spill log (documented weekly inspections for November 2015 - February 2016). There was emergency and equipment information posted in this area, but it was not posted next to a phone.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16



12. A view, at the Stock Room, of one satellite accumulation area (SAA) that consisted of one 55-gallon drum. The drum contained spent aerosol cans. The drum was labeled as "Used Aerosol Cans" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum.

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

13. A view, at the Oil/Water Separator Room, of one of three 250-gallon totes that contained used oil. All three of the totes were not labeled as "Used Oil."

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

14. A view, at the Oil/Water Separator Room, of one of three 250-gallon totes that contained used oil. All three of the totes were not labeled as "Used Oil."

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

15. A view, at the Oil/Water Separator Room, of one of three 250-gallon totes that contained used oil. All three of the totes were not labeled as "Used Oil."

CWC Textron, Incorporated - Muskegon, MI
Bryan Gangwisch, U.S. EPA 2/23-2/24/16

2/23 - 2/24/16 CWC Textron, Inc. MID006030357

Department of Environmental Quality
SMALL QUANTITY GENERATOR INSPECTION FORM

Facility's Name CWC Textron, Inc. Part 3Rules

Date 2/23 - 2/24/16 ID# MID006030357 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
spent aerosols D001	painting	small quantity generator amounts
salt bottoms D001, D002	process tank cleanout	varies
transformer fluid flush D039, Foor	transformer cleanout	varies

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

(NI - Not Inspected N/A - Not Applicable)

		YES NO
WASTE DETERMINATION (Rule 302: 40 CFR 262.11		
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	262A	[ ] [X] NI N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)	262D	[ ] [X] NI N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[X] ___ NI N/A
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)		
2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	[X] ___ NI N/A
MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)		
3. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	262D	[X] ___ NI N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	262D	[X] ___ NI N/A
5. Manifests, prepared by the generator (Rule 304(1)(b): 40 CFR 262.20(a)), contain the following?	262B	[X] ___ NI N/A
a) manifest document number. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
d) name, address & ID # of TSDF. (Rule 30412)(b): 40 CFR 262.20(b)&(c)	262B	[X] ___ NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
h) generator signature, initial transporter & date of acceptance?(Rule 304(1)(b): 40 CFR 262.20(a))	262B	[X] ___ NI N/A
6. Not Applicable		
7. For out-of-state manifests, was copy of 3rd signature manifest submitted to Director? (Rule 304(2)(c)	262B	[X] ___ NI N/A
8. Is the transporter used properly registered /permitted under Act 138, Section 3 (2)? (Rule 304(1)(c)	262B	[X] ___ NI N/A
9. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 262.20(a))	262B	___ [X] NI N/A
10.Reportable exceptions. (Rule 308(5): 40 CFR 262.42)(b))		
a) number of manifests generator HASN'T receive signed copy from TSD w/in 60 days.	262D	N/A
b) number generator DID NOT submit copy of manifest & statement on non-confirmation of delivery to DEQ.	262D	N/A

OR

11. Did the facility manifest hazardous waste off-site which:		
a) is reclaimed under contractual agreement & reclaimed material comes back? Rule 304(3)(a): 40 CFR 262.20(e))	262D	[ ] ___ NI N/A
b) does facility maintain copy of contractual agreement on-site for not less than 3 years? (Rule 304(3)(b):40 CFR 262.20(e))	262D	[ ] ___ NI N/A

NOTE: ***For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h)***

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)(Rule 311(1))

Note: *Not all requirements applicable if waste shipped off-site and material returned under contractual agreement.*

		YES	NO
12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a)(1))			
a) all listed waste	**268A**	[X]	___ NI N/A
b) all characteristic wastes?	**268A**	[X]	___ NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (40 CFR 268.7(a)(2)	**268A**	[X]	___ NI N/A

OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (40 CFR 268.7(a)(3)	**268A**	[ ]	___ NI (N/A)

OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (40 CFR 268.7(a)(4)	**268A**	[ ]	___ NI (N/A)

OR

16. If facility chooses alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (40 CFR 268.7(a)(9))	**268A**	[ ]	___ NI (N/A)
17. Did the notice include: (40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)			
a) EPA hazardous waste #?	**268A**	[X]	___ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	**268A**	[X]	___ NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	**268A**	[X]	___ NI N/A
d) manifest number associated with the shipment?	**268A**	[X]	___ NI N/A
e) waste analysis data, where available?	**268A**	[X]	___ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	**268A**	[X]	___ NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1) & 268.9)	**268A**	[ ]	___ NI (N/A)
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	**268A**	[ ]	___ NI (N/A)

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*

NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

18. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	**268A**	[X]	___ NI N/A
19. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	**268A**	[ ]	___ NI (N/A)
20. Were all notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	**268A**	[X]	___ NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3) RULE 311(1)

21. Generator dilutes hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	**268A**	___	[X] NI N/A

TREATMENT STANDARDS (40 CFR 268.40) RULE 311(1)

22. If wastes exceeding treatment standards are mixed, were the most stringent standards selected? (40 CFR268.40(c))	**268A**	[ ]	___ NI (N/A)

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

23. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR262.30))	**262C**	___co.said ___obsrvd [X]	___ NI N/A
24. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)?(Rule 305(1)(b)&(c): 40 CFR 262.32(a))	**262C**	___co.said ___obsrvd [X]	___ NI N/A
25. On containers 119 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	**262C**	___co.said ___obsrvd [X]	___ NI N/A

26. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X] ___ NI N/A

There was no hw in storage at time of the inspection

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

27. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) do containers have accumulation date & visible? (Rule 306(4)(c): 40 CFR 262.34(d)(4))	262C	[ ] ___ NI N/A
b) do container have words "Hazardous Waste"? (Rule 306(4)(d): 40 CFR 262.34(d)(4))	262C	[ ] ___ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(4)(c))	262C	[ ] ___ NI N/A
d) has more than 180 (270 if over 200 miles) days elapsed since date marked? (Rule 306(4) or (5):40 CFR 262.34(d) or (e))	262C	___ [ ] NI N/A
e) has quantity of waste exceeded 6000 kg? (Rule 306(4)(a): 40 CFR 262.34(d)(1))	262C	___ [ ] NI N/A

UNLESS

f) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

g) are containers in good condition? (265.171)	262C	[ ] ___ NI N/A
h) are containers compatible with waste in them (265.172)	262C	[ ] ___ NI N/A
i) are containers stored closed? (265.173(a))	262C	[ ] ___ NI N/A
j) are containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	___ [ ] NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[X] ___ NI N/A
l) are incompatible wastes stored in separate containers? (265.177(a))	262C	[ ] ___ NI N/A
m) are hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [ ] NI N/A
n) are incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ] ___ NI N/A
o) if facility accumulates over 1000 kg is there secondary containment which? (Rule 306)(4)(b)(i))	262C	[X] ___ NI N/A
i) if accumulating free liquids or F020,F021, F022, F023, F026 & F027, the hazardous waste accumulation area :		
A) has impervious base free of cracks? (264.175(b)(1))	262C	[X] ___ NI N/A
B) is sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	[X] ___ NI N/A
C) holds 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	[X] ___ NI N/A
D) prevents run-on unless sufficient capacity? (264.175(b)(4))	262C	[X] ___ NI N/A
E) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	[ ] ___ NI N/A
ii) if accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c) (1&2)	262C	[X] ___ NI N/A
28. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[ ] X NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[ ] X NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

e) are container(s) in good condition? (265.171)	262C	[X] ___ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[X] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[X] ___ NI N/A
29. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste: (Rule 306(2): 40 CFR 262.34(c)(2)		
a) mark the container with the date the excess amount began accumulating?	262C	[ ] ___ NI N/A
b) move to an area with secondary containment?	262C	[ ] ___ NI N/A
30. Is hazardous waste accumulated in anything other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? No, there is process tank cleaning — salt bottoms *Explain any yes answer.*		___ X NI N/A
31. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	[X] ___ NI N/A
32. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(4)(j))	262C	[X] ___ NI N/A
33. Is hazardous waste accumulated in tanks? No *If so, complete Tank System inspection form.*		___ X NI N/A
34. Is hazardous waste placed on drip pads? No *If so, complete Wood Preserving inspection form*		___ X NI N/A

PERSONNEL TRAINING (Rule 306(1)(d) & 40 CFR 262.34(a)(4))		YES NO
35. Emergency coordinator(s) identified & available at all times? (Rule 306(4)(f):40 CFR 262.34(d)(5)(I))	262C	[X] ___ NI N/A
36. Next to phone is the following posted? (Rule 306(4)(g):40 CFR 262.34(d)(5)(ii)(A-C))		
a) name & phone number of emergency coordinator(s) posted, but not by phone	262C	[ ] X NI N/A
b) location of fire extinguishers, spill control equipment and fire alarms, if present?	262C	[ ] X NI N/A
c) phone number of fire department (not needed if direct alarm)?	262C	[ ] X NI N/A
37. Employees know waste handling & emergency procedures? (Rule 306(4)(h):40 CFR 262.34(d)(5)(iii))	262C	[X] ___ NI N/A
38. If facility has had emergency, did coordinator take appropriate response? (Rule 306 (4)(i):40 CFR 262.34(d)(iv)(A-B))	262C	[ ] ___ NI (N/A)

AND

39. If there has been a fire, explosion or release which threatened human health or if spill reached surface water did facility call PEAS and NRC? (Rule 306(4)(i)(iii)(A-H):40 CFR 262.34 (d)(5)(iv)(C)(1-5).	262C	[ ] ___ NI (N/A)

Rule 306(4)(e) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37

		__co.said __obsrvd
40. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	[X] ___ NI N/A
41. If required, does this facility have the following equipment:		
a) internal communications or alarm systems? (265.32(a))	262C	[X] ___ NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	[X] ___ NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	[X] ___ NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	[X] ___ NI N/A
42. Testing and Maintenance of Emergency Equipment:		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	[X] ___ NI N/A
b) has owner/operator provided immediate access to internal alarms? (265.34(a & b)) ***NOTE:*** *Access to communication or alarm system is applicable **only** if required 40 CFR 265. 32*		
i) when hazardous waste is being poured, mixed, etc.	262C	[X] ___ NI N/A
ii) if only one employee on the premises while facility is operating.	262C	[ ] ___ NI (N/A)
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	[X] ___ NI N/A
43. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	[X] ___ NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

44. Has the facility imported or exported hazardous waste?		___ X NI N/A
a) Exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (262.52(a))	262E	[ ] ___ NI (N/A)
ii) receiving country consented to accept waste. (262.52(b))	262E	[ ] ___ NI (N/A)
iii) has copy of EPA Acknowledgment of Consent. (262.52(c))	262E	[ ] ___ NI (N/A)
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ] ___ NI (N/A)
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ] ___ NI (N/A)
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] ___ NI (N/A)

COMMENTS:

DEQ

Department of Environmental Quality, Waste and Hazardous Materials Division

USED OIL INSPECTION FORM – GENERATORS

Facility's Name CWC Textron, Inc. Part 8 Rules

Date 2/23-2/24/16 ID# MID 006030357 1994 PA 451

Note: *Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109*

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable		YES	NO
1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		X	
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA		X
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA		X
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	X	
d) mixture of used oil and fuel? (Rule809(1)(d))	UOA		X
e) material which is produced from used oil & is burned for energy recovery? (Rule 80991)(e))	UOA		X
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1(f))			
i) maximum arsenic concentration of 5ppm	UOA		X
ii) maximum cadmium concentration of 2ppm	UOA		X
iii) maximum chromium concentration of 10ppm	UOA		X
iv) maximum lead concentration of 100ppm	UOA		X
v) minimum flash point of 100 degrees Fahrenheit	UOA		X
vi) maximum total halogen concentration of 4,000ppm	UOA		X
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA		X
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(i))	UOA		X
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA		X
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule809(2)(b)(ii))	UOA		
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed?(Rule 809 (2)(c))	UOA		
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA		
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809((2)(g))	UOA		
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809 (2)(j))	UOA		
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m)	UOA		
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule809(2)(o))	UOA		
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		

GENERATOR REQUIREMENTS (Rule 810)

NOTE: Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4)	UOA		[X] NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	[X]	NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	[X]	NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	[ ]	[X] NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	[ ]	NI (N/A)
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	[ ]	NI (N/A)
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	[ ]	NI (N/A)
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	[ ]	NI (N/A)
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	[ ]	NI (N/A)

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER
(Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	[ ]	NI (N/A)
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour?(40 CFR 279.23(b))	UOA	[ ]	NI (N/A)
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	[ ]	NI (N/A)

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL
(Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	[X]	NI N/A

OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	[ ]	NI (N/A)
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	[ ]	NI (N/A)
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	[ ]	NI (N/A)
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	[ ]	NI (N/A)
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	[ ]	NI (N/A)
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	[ ]	NI (N/A)
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA	[ ]	NI (N/A)
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	[ ]	NI (N/A)
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	[ ]	NI (N/A)
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	[ ]	NI (N/A)

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	[ ]	NI (N/A)
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	[X]	NI N/A

COMMENTS:-

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION

Facility Name CWC Textron, Inc. Part 2 Rules

Date 2/23 - 2/24/16 I.D. # MID006030357 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)		YES NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	[ ] [X] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	[ ] [X] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14) None observed during inspection

ANTIFREEZE: (Rule 228(4))		QTY HANDLED: ____
3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] NI (N/A)
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] NI (N/A)
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.B	[ ] NI (N/A)
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] NI (N/A)
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	[ ] NI (N/A)

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements)		QTY HANDLED: ____
8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	[X] NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[ ] NI (N/A)
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[X] NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI (N/A)
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI (N/A)
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI (N/A)
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	[X] NI N/A

None observed during inspection

CONSUMER ELECTRONICS: (Rule 228(4))		QTY HANDLED: ____
13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] NI (N/A)
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] NI (N/A)
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] NI (N/A)
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)((g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] NI (N/A)

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d) **QTY HANDLED:** _____

17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	___ [X] NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii))	273.B	[X] ___ NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ~~ELECTRIC~~ LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ~~ELECTRIC~~ LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	[X] ___ NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[ ] ___ NI (N/A)
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[ ] ___ NI (N/A)
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[ ] ___ NI (N/A)
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[ ] ___ NI (N/A)

None observed during inspection

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14 **QTY HANDLED:** _____

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] ___ NI (N/A)
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] ___ NI (N/A)
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] ___ NI (N/A)
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] ___ NI (N/A)
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] ___ NI (N/A)
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] ___ NI (N/A)
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI (N/A)
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] ___ NI (N/A)
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] ___ NI (N/A)
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] ___ NI (N/A)
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] ___ NI (N/A)
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] ___ NI (N/A)
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] ___ NI (N/A)

None observed during inspection

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) **QTY HANDLED:** _____

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] ___ N (N/A)
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] ___ NI (N/A)
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] ___ NI (N/A)
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] ___ NI (N/A)
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] ___ NI (N/A)

None observed during inspection

PHARMACEUTICALS: (Rule 228(4) **QTY HANDLED:** _____

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] ___ NI (N/A)
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] ___ NI (N/A)

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.B	[ ] NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	[ ] NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	[X] NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	[ ] NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	[X] NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	[ ] NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	[ ] NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	[ ] NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	[ ] NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	[ ] NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	[X] NI N/A

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	[ ] NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	[X] NI N/A
45. If the SQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b)	273.B	[ ] NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	[X] NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	[X] NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	[ ] NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	[ ] NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) **OR**	273.B	[ ] NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	[ ] NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a)):40 CFR 273.18(g))	273.B	[ ] NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	[ ] NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	[ ] NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	[ ] NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	[ ] NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [ ] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [ ] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

COMMENTS: